

**Certified Unified Program Agency
County of Riverside Community Health Services Agency
Department of Environmental Health
Hazardous Materials Management Division
HAZARDOUS WASTE GENERATOR INSPECTION
SUPPLEMENTAL REPORT**

Facility Name: B.F. Goodrich (Generator)
Facility# 80679

Page 2 of 3

Date of Inspection: Initial- 9/21-25/2001; Follow-up dates October 2001 through March 2002

Report By: Sandra J. Facinelli, Hazardous Materials Management Specialist

A full facility inspection was conducted of the above facility throughout several days during the above time period. All buildings/structures on site were inspected as well as a complete perimeter walk. See Attachments I and II for a facility map and a list of buildings, operations and the hazardous wastes being generated at the time of inspection.

The following is a list of the violations that were documented at the time of inspection. These violations are marked on Page 1. (Note: These are the items that were stated verbally to you during the inspections and they were also listed in the field notes that you were given a copy of during our follow-up discussions.) Please provide a written response indicating that the violations have been corrected as soon as possible.

103B.) In Building #1 there was a satellite accumulation area with 2 separate bins, one for 'Alodine' waste and one for miscellaneous waste, the labels on the outside of the container were transposed and the 'Alodine' waste was labeled as miscellaneous and vice versa. The bags inside the bins were not labeled. In Building #4 there was a small lab waste container under the sink in an old laboratory room that was not labeled. In Building #5 there was a 1-gal. waste hexane container that was not labeled in the laboratory sink. Outside near the 'Co-Gen' area, there were several containers with unknown contents that were not labeled. Outside of Building #59 a 55-gal drum containing used oil was not labeled. In Building #60 there were boxes of CRTs that were improperly labeled as non-hazardous waste instead of the proper 'Universal Waste' label. The Generator shall ensure hazardous waste is placed in appropriate and properly labeled accumulation areas and that all hazardous wastes and universal wastes are properly labeled as to contents.

103F.) In Building #5 the 1-gal. waste hexane container was open. Outside of Building #59 a 55-gal. drum containing used oil was open. The Generator shall ensure all hazardous wastes are properly closed unless adding to or removing from contents.

105D.) At the time of initial inspection, there were no specific written procedures for hazardous waste spills available on site for on-site hazardous waste clean-up contractor employees. The Generator shall ensure a written contingency plan, including emergency response procedures for different types of hazardous waste spills, is available on site.

106.) Behind Building #5 the lab sink, process wastewater and rinsewater, and corrosive liquid waste from the 'hand-line', all drain to an underground single-walled tank in an un-lined concrete vault which connects to underground single-wall steel piping that runs to an aboveground tank. The contents of this tank are then pumped and recycled on-site in the wastewater treatment plant. The Generator does not consider this an aboveground hazardous waste tank because the liquid in the tank is recycled on site in their process. Near Building #27 there was a concrete containment area containing several inches of built-up corrosive residue open to the environment. Outside of Building #59, there was an oil spill on the ground near the drums in the containment area. Several buildings on site, including Building #17, Building #24, Building #29 and Building #65, have aboveground hazardous waste 'totes' containing 'Alodine' (chrome-based substance) wastewater, waste fixer containing silver, oily water from steam-cleaning, etc. Many of these totes containing hazardous wastes have single-walled piping in below-grade unlined trenches that are not able to be visually inspected. The Generator considers these totes as portable tanks, not subject to aboveground hazardous waste tank requirements;

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106.) **cont.** however, there is no method for detection or containment of a hazardous waste release from these single-walled lines. Also, according to facility records, there are old underground tank structures on site which formerly contained Alodine waste which may require remediation. The Generator shall maintain all hazardous wastes to minimize the possibility of release and ensure hazardous wastes have not been released into the environment. The Generator shall assess the alternatives of lining below-grade trenches, visually inspecting lines, upgrading lines with double-wall piping, or some other method to maintain these lines to minimize the possibility of release.

114.) Respirator fit testing records for on-site hazardous waste contractor employees were not updated at the time of inspection. An employee in Building #4, working in the chrome-based paint area, was not wearing gloves. Training for use of personal protective equipment is required to be updated annually for employees dealing with hazardous waste. The training program shall include specific hazardous waste training for all employees.

NO OTHER VIOLATIONS WERE NOTED AT THE TIME OF INSPECTION. THE GENERATOR SHALL SUBMIT A CERTIFICATION OF COMPLIANCE WITH THE ABOVE ITEMS.

Department of Environmental Health
Hazardous Materials Management Division
HAZARDOUS WASTE GENERATOR INSPECTION
ATTACHMENT I

Facility Name: B.F. Goodrich (Generator)
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List of Buildings, Operations and Hazardous Wastes
Attachment I Page 1 of 3

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Location	Operations	Hazardous Wastes
Building #1	Gridlock- machining aluminum, lay-up and assembly	Coolant, cutting fluids, rags and wipers
	Chromated conversion coating	Alodine waste (chrome and water), rags and wipers
	Paint crib	Gun-wash, filters, cups, stirrers, rags, wipers, paint, primer and miscellaneous waste
	Painting areas and spray booths	Adhesive primer, debris, brushes, coveralls, mask, filters, gloves, paint sludge, cardboard
	Grinding operations	Excluded recyclable material, abrasive blasting grit (Aluminum oxide)
	Shipping	
Building #2	Empty offices	
Building #3	Operations Support and Tooling	Rags, debris, paint waste and miscellaneous
Building #4	Bond shop and Adhesive operations	Waste pre-preg, liquid adhesive, catalyst, mixing cups, potting tubes, stirrers, solvent, coveralls, gloves, rags, resins
	Perchloroethylene degreasing system	Still bottoms, contaminated condensate, activated carbon, liquid perc.
	Clean Line Anodizing Process Line and surface prep and Old 'C-Line'	NaOH, nitric acid, phosphoric acid, trace metals, wastewater, ion exchange cylinders
	Laboratory	General lab waste, flammable liquids, corrosives, sink waste, rags, debris, adhesive waste
	Spray and bake adhesive and primer coating	Gun-wash, filters, cups, stirrers, rags, wipers, paint, primer and miscellaneous waste
	Chromated conversion coating	Alodine waste, rags and wipers
Bond Shop Annex- Building #1 and #4	Post Bond- De-flashing, route and flash	Miscellaneous wastes, rags, wipers, Alodine waste
	Spray booths	Gun-wash, filters, cups, stirrers, rags, wipers, paint, primer, debris, paint booth waste
	Machining/clean-up	Miscellaneous rag and solvent waste
	Adhesive Crib	Waste pre-preg, liquid adhesive, catalyst,

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Location	Operations	Hazardous Wastes
Building #5	Laboratory- testing and research Old laboratory	General lab waste, flammable liquids, corrosives, sink waste, rags, debris, adhesive waste, Alodine waste
	Spray booth	Miscellaneous waste, spray booth waste, gun-wash, rags, wipers, etc.
	Hand-Line	Corrosive liquids, rinsewater, wastewater
	Oven-bake	
Building #12	Phone System	
Building #18	Empty Offices	
Building #14	Storage for old equipment and old spray booth no longer in use	
Building #15	Maintenance	Used oil, parts washer and miscellaneous wastes
	Masking application	
	Abrasive blasting	Excluded recyclable material
	Spray booth	Miscellaneous wastes, paint wastes, gun-wash, rags, booth filters
	Storage for old equipment	
Building #16	Gridlock	Coolant, cutting fluids, rags, miscellaneous wastes
	Spray booth	Paint wastes, booth filters, gun-wash, etc.
	Adhesive Operations	Adhesive wastes, Alodine wastes
Building #17	Repair	Miscellaneous wastes, gunwash, rags, solvent, debris, etc.
	Chromated conversion coating	Alodine waste
Building #19	Empty building	
Building #20	Prototype building	Miscellaneous wastes, rags, solvent, debris
Building #21	Empty- Temp. packaging and shipping	
Building #22	Storage	
Building #24	FAA Repair	Miscellaneous wastes, rags, solvent, debris
	Chromated conversion coating	Alodine waste
	Flame spray booth, silicon spray application	Spray booth wastes, filters, gun-wash, adhesive wastes, etc.
	Spot application	Phosphoric acid waste, phosphoric acid rinse, alodine rinse
Building #27	Utilities, boilers, compressors and chillers	Oily water, miscellaneous waste, rags, solvent, debris, descaling waste, used oil

BUILDING #5

- LABS - TESTING/RESEARCH
- SPRAY BOOTH?
- BEHIND BUILDING - AGT WASTE " UNDERGROUND VAULT
- HAND-LINE?
- OLD LAB
- OVEN BAKE

BUILDING #12

COMPUTER PHONE SYSTEM

- lab waste ^{align at 12:00}
- miscellaneous waste
- spray booth waste, gen wash, etc.
- Alodine waste bin

UNDERGROUND VAULT - sink waste, wastewater,
rinse water, lab sinks, etc. hand line waste - acids & bases
rinse water

✓ waste hexane - open, unlabeled in sink

✓ underground waste line
underground tank containing waste

BUILDING #18

- EMPTY OFFICES

BUILDING #14

- STORAGE - OLD EQUIPMENT
- OLD SPRAY BOOTH

BUILDING #15

- MAINTENANCE
- MASKING APPLICATION
- ABRASIVE
- BLASTING
- SPRAY BOOTH
- STORAGE - OLD EQUIPMENT

used oil, miscellaneous waste bin, paint waste,
gen wash, rags, boom filters, ~~parts washer~~
~~disposal tanks~~
- excluded recyclable material from
blasting operations

BUILDING #16

- GRIDLOCK
- SPRAY BOOTH
- ADHESIVE

cooler + cutting fluids, miscellaneous wastes
rags, etc.
- paint waste - booth - gen wash
- Adhesive wastes
- Alodine waste bin

BUILDING #17

- REPAIR
- ~~PAINT BOOTH~~ ?
- CHROMATED CONVERSION COATING
- ~~SPOT APPLICATION~~

- miscellaneous wastes
 - paint booth wastes - gen wash
 - chromating water - "Alodine" waste bin
- *

BUILDING #19

- EMPTY

BUILDING #20

- PROTOTYPE BUILDING

- miscellaneous wastes
- rag, solvent, debris

BUILDING #21

- EMPTY - TEMPORARY PACKAGING & SHIPPING

BUILDING #22

- STORAGE

BUILDING #24

- FAA REPAIR
- CHROMATED CONVERSION COATING
- FLAME SPRAY BOOTH
- SILICON SPRAY/APPLICATION
- SPOT APPLICATION - PHOSPHORIC ACID
- ~~PAINT / ADHESIVE~~

- miscellaneous wastes
 - spray booth wastes - filters, etc.
 - chromating water - "Alodine" waste bin
 - phosphoric acid waste
 - ~~gen wash~~ / adhesive wastes
 - phosphoric acid rinse
 - & alkaline rinse
- *

~~BUILDING #26~~

BUILDING # 27

- UTILITIES
- BOILERS
- COMPRESSORS
- CHILLERS

- oily water
- standard miscellaneous waste
- descaling waste
- used oil

BUILDING # 28

BUILDING # 30

- GUARD / OFFICES

BUILDING # 31

- PRODUCTION

HONEYCOMB CORE

ETHYLENE GLYCOL - APPLICATION

HEAT EXCHANGE MACHINING OF
MEDIA CORE

- standard
- miscellaneous wastes
- metal shavings
- ethylene glycol?

BUILDING # 32

STORAGE / RECEIVING

BUILDING # 32A &

EMPTY

BUILDING # 32B

FROZEN STORAGE

BUILDING #39

- EMPTY

BUILDING #40

- HONEYCOMB FORMING

"paint/solvent/seal debris"
"organic debris"

- Standard miscellaneous wastes
- metal shavings

BUILDING #41

- EMPTY - OLD AUTOCLAVE

BUILDING #53 / AREA SURROUNDING

- OLD COGEN PLANT
- EMPTY BUILDINGS
- ON-SITE WASTEWATER TREATMENT PLANT

COGEN
old chemicals - unlabeled
if waste exceed 90 day
old chemicals from cogen

- De-sulfing waste
- ion exchange?

WASH - Acid - residue in
containment?

BUILDING #27

- standard miscellaneous waste

BUILDING #52

- MACHINE SHOP

BUILDING #55

- UTILITIES

BUILDING #58

- CMM INSPECTION

- standard miscellaneous waste

IPA 100%

BUILDING #59

- AUTOMOTIVE PAINT SHOP
- WELDING SHOP
- WOOD SHOP
- AUTO MAINTENANCE

- used oil ^{containment area spill}
open - unlabeled

- paint waste - spray booth waste
F&S parts washer
- standard miscellaneous waste

BUILDING #60

- HAZARDOUS WASTE PROCESSING & STORAGE
- HAZARDOUS MATERIALS STORAGE

Everything!

BUILDING #65

CONTRACT TOOL STORAGE

- STEAM CLEANING (BRAYCOTE REMOVAL FROM TOOLS)

WAXY-PROTECTIVE COATING
USING DIESEL + STEAM CLEAN

- oil, water

- miscellaneous standard waste

* underground line? waste

BUILDING #304 + NEARBY AREA

- EXCLUDED RECYCLABLE MATERIAL
- NON-HAZARDOUS STORAGE
- GROUNDWATER TREATMENT SYSTEM

- non-haz dust. abrasive blasting

- excluded recyclable material

ERM requirements?

- activated carbon waste container

Non-Haz Al Shavings from trimming cor
AlOxide - Grit Blasting Operation

BUILDING #843

- RECORDS STORAGE

MISCELLANEOUS YARD STORAGE

- TOOL STORAGE
- EQUIPMENT STORAGE
- SALVAGE YARD

RIVERSIDE FLOOD CONTROL CHANNEL

- ON-SITE RETENTION BASIN

GENERAL OFFICE/FACILITY

✓ CFTs labeled as non-haz instead of universal waste

universal waste

alkaline bat
lights, mercury

asbestos, 1

CONSTRUCTION/DECOMMISSIONING OF BUILDINGS